

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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|---------------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| vs. | § | CRIMINAL NO. 4:19-CR-00719 |
| | § | |
| JOSEPH COHEN | § | |

DEFENDANT'S MOTION FOR PRETRIAL DETENTION RELIEF

TO THE HONORABLE CIRCUIT JUDGE GREGG COSTA:

Defendant, Joseph Cohen, by and through his attorneys of record, John T. Floyd and Chris Choate, respectfully requests that this Honorable Court order the Joe Corley Detention Facility to give him sufficient time in the Law Library to review discovery in his case. In support, Defendant would show as follows:

1. The following deadlines apply in this case:
 - May 19, 2022 at 9:00a – Exhibit Authentication hearing
 - June 10, 2022 at 1:00p – Voir Dire and Trial begins
2. Defendant is currently detained at the Joe Corley Detention Facility.
3. This case involves at least 12 defendants and thousands of pages of chat logs, email messages, reports of investigation, images, and recordings.
4. A physical copy of this discovery is impractical to provide to Defendant. Regular access to, and expanded use of, the Joe Corley Detention Facility's Law Library is necessary because Defendant must use a computer to review the discovery in his case.
5. During the Status Conference held on March 25, 2022, this Honorable Court ordered the United States Marshals to provide all Defendants in this prosecution access to

detention facility libraries so that Defendants may have adequate time to review discovery.

6. On Tuesday, May 10, 2022, Counsel provided the Joe Corley Detention Facility warden a thumb drive for Defendant's review. Counsel also informed the warden that Defendant must be able to review the discovery and have expanded access to the Law Library to do so.
7. On or about May 10 or 11, 2022, Defendant submitted a hand-written request to have access to the Law Library to review the discovery in his case. No response to this hand-written request was given.
8. On or about May 10 or 11, 2022, Defendant also submitted an electronic request for daily access to the Law Library, in Request No. 177971942. Defendant was informed that he would not be allowed to have daily access to the Law Library, and that his access would be limited to the five hours per week he is currently allotted.
9. As of the date of this Motion, Defendant has not been given access to the Law Library.

PRAYER

Defendant respectfully requests that this Honorable Court order the United States Marshals and the Joe Corley Detention Facility to provide Defendant with expanded daily access to the Law Library so that he may have adequate time to review the discovery in his case.

Dated May 17, 2022.

Respectfully submitted,
The John T. Floyd Law Firm

/s/ John T. Floyd III

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion has been served upon the Assistant United States Attorney, via ECF, email, hand delivery, or any other valid method of service on May 17, 2022.

/s/ John T. Floyd III

John Thomas Floyd III
Chris Choate